

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

_____	)	
HARRIET MENEZES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Case No. 04-10365JLT
	)	
ASSOCIATION OF FLIGHT ATTENDANTS-	)	
CWA, AFL-CIO, et al.,	)	
	)	
Defendants.	)	
_____	)	

**UNION DEFENDANTS' MOTION FOR FOR EXTENSION OF TIME IN WHICH  
TO RESPOND TO MOTION TO REOPEN CASE  
AND CERTIFICATION PURSUANT TO LOCAL RULE 7.2**

The Plaintiff, Harriet Menezes, has filed a Motion to Reopen this case, and a companion case, Menezes v. United Airlines, Inc. et al, No. 04-10366 JLT. This Motion requests an extension of time until February 2, 2005 in which to respond to the Motion. As grounds therefore, the Association of Flight Attendants-CWA, AFL-CIO ("Union"), and the individual union defendants state:

1. Ms. Menezes filed these actions in February of 2004 alleging a breach of the duty of fair representation against the Union and union-affiliated individuals, and asserting various statutory claims against United Airlines.
2. On or about November 2004, after a status conference before this Court, Ms. Menezes and defendants entered into a settlement agreement. A Stipulation of Dismissal was filed with the Court on or about January 7, 2005.
3. On or about January 13, 2006, Ms. Menezes filed a Motion to Reopen her case. The Motion alleges various acts of alleged wrongdoing against United

Airlines. It does not make any claims against the Union or the union affiliated individual defendants. The Defendants' response is now due on January 23, 2006.

4. The Union is currently investigating the allegations contained in Ms. Menezes Motion, and needs additional time in which to respond.
5. United Airlines has sought an extension of time in which to respond until February 2, 2006, which has been granted by the Court.

WHEREFORE, Defendants respectfully request that they be allowed until February 2, 2006 to respond to the Motion.

Rule 7.1 Certification

The undersigned counsel certify that Attorney Gilmartin has conferred with Ms. Menezes, who opposes the Motion. Attorney Sullivan has conferred with Attorney Politis who has no objection.

Respectfully submitted,

Association of Flight Attendants-CWA,  
AFL-CIO, et al

/s/ Edward J. Gilmartin  
Edward J. Gilmartin  
Association of Flight Attendants-  
CWA, AFL-CIO  
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/s/Mary T. Sullivan  
Mary T. Sullivan, BBO # 487130  
Indira Talwani, BBO # 645577  
SEGAL, ROITMAN, AND COLEMAN  
11 Beacon St., Suite 500  
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(617) 742-0208

Dated: January 20, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Motion For Extension of Time was served upon Harriett Menezes, 169 Thoreau Street, Apt. 8, Concord, MA 01742 and Brigitte Duffy and Yvette Politis, Seyfarth Shaw, World Trade Center East, Two Seaport Lane, Suite 300, Boston, MA 02210 by first class mail this 20<sup>th</sup> day of January, 2006.

/s/ Mary T. Sullivan  
Mary T. Sullivan